

Exhibit E

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UMG RECORDINGS, INC., et al.,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
GRANDE COMMUNICATIONS)	No. 1:17-cv-00365
NETWORKS LLC and PATRIOT MEDIA)	
CONSULTING, LLC,)	
)	
Defendants.)	
)	
)	

**DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S
OBJECTIONS AND RESPONSES TO PLAINTIFFS' SECOND SET OF
REQUESTS FOR ADMISSION**

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Defendant Grande Communications Networks LLC ("Grande"), by and through its attorneys, provides the following answers and objections to Plaintiffs' Second Set of Requests for Admission.

GRANDE'S RESPONSES TO REQUESTS FOR ADMISSION

22. Admit you terminated no subscriber based on an allegation of copyright infringement in 2011.

RESPONSE:

Grande objects to this request for admission as overly broad, unduly burdensome, seeking irrelevant information, and not proportional to the needs of the case, in that the time limitation identified extends beyond the relevant time period. Subject to these objections, Grande admits that in 2011 it terminated no subscriber based on an allegation of copyright infringement, as that is not what 17 U.S.C. § 512 requires.

23. Admit you terminated no subscriber based on an allegation of copyright

infringement in 2012.

RESPONSE:

Grande objects to this request for admission as overly broad, unduly burdensome, seeking irrelevant information, and not proportional to the needs of the case, in that the time limitation identified extends beyond the relevant time period. Subject to these objections, Grande admits that in 2012 it terminated no subscriber based on an allegation of copyright infringement, as that is not what 17 U.S.C. § 512 requires.

24. Admit you terminated no subscriber based on an allegation of copyright infringement in 2013.

RESPONSE:

Grande objects to this request for admission as overly broad, unduly burdensome, seeking irrelevant information, and not proportional to the needs of the case, in that the time limitation identified extends beyond the relevant time period. Subject to these objections, Grande admits that in 2013 it terminated no subscriber based on an allegation of copyright infringement, as that is not what 17 U.S.C. § 512 requires.

25. Admit you terminated no subscriber based on an allegation of copyright infringement in 2014.

RESPONSE:

Grande objects to this request for admission as overly broad, unduly burdensome, seeking irrelevant information, and not proportional to the needs of the case. Subject to these objections, Grande admits that in 2014 it terminated no subscriber based on an allegation of copyright infringement, as that is not what 17 U.S.C. § 512 requires.

26. Admit you terminated no subscriber based on an allegation of copyright

infringement in 2015.

RESPONSE:

Grande objects to this request for admission as overly broad, unduly burdensome, seeking irrelevant information, and not proportional to the needs of the case. Subject to these objections, Grande admits that in 2015 it terminated no subscriber based on an allegation of copyright infringement, as that is not what 17 U.S.C. § 512 requires.

27. Admit you terminated no subscriber based on an allegation of copyright infringement in 2016.

RESPONSE:

Grande objects to this request for admission as overly broad, unduly burdensome, seeking irrelevant information, and not proportional to the needs of the case. Subject to these objections, Grande admits that in 2016 it terminated no subscriber based on an allegation of copyright infringement, as that is not what 17 U.S.C. § 512 requires.

28. Admit that you did not terminate any subscriber based on an allegation of copyright infringement from 2011 until after Plaintiffs filed this lawsuit in April 2017.

RESPONSE:

Grande objects to this request for admission as overly broad, unduly burdensome, seeking irrelevant information, and not proportional to the needs of the case, in that the time limitation identified extends beyond the relevant time period. Subject to these objections, Grande admits that from 2011 to April 2017 it did not terminate any subscriber based on an allegation of copyright infringement, as that is not what 17 U.S.C. § 512 requires.

Respectfully submitted,

Dated: June 6, 2018

By: /s/ Richard L. Brophy
Richard L. Brophy
ARMSTRONG TEASDALE LLP

*Attorney for Defendant Grande
Communications Networks LLC*

CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2018, I served the foregoing electronically to the following:

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